

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 02-61191-CIV-HUCK/TURNOFF

MERRILL LYNCH BUSINESS FINANCIAL  
SERVICES, INC.

Plaintiff

v.

FRANK L. AMODEO, JAMES SADRIANNA  
and SIGNATURE GRAPHICS, INC.

Defendants.

03 JUL 23 PM 3:28  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
03 JUL 23 PM 4:27

**NOTICE OF COMBINED RESPONSE TO SUBPEONA DUCES TECUM AND  
REQUEST FOR PROTECTIVE ORDER**

COMES NOW Credix Corporation ("Credix") by and through Frank L. Amodeo ("Amodeo") and files this objection to Merrill Lynch Business Financial Services, Inc. ("Merrill") subpoena duces tecum showing the Court Merrill's request is:

1. Overbroad, overreaching and irrelevant to the proceeding,
2. Requests information privileged and confidential between persons not party to this action,
3. Has already been provided in other discovery requests,
4. Is available to Merrill through other means no more burdensome to Merrill and less burdensome to Credix, and
5. Any other appropriate objection in law or equity.
6. The service of process was made on July 9, 2003 and received by Amodeo on July 12, 2003. Therefore, delivery is not required until August 2, 2003.

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Without waiving any of the foregoing objections in order to facilitate the conclusion of this proceeding, Amodeo as agent for Credix answers as follows:

Credix has never received any assets or payments in cash or kind from Smith International Enterprises, Inc. or Signature Graphics, Inc. Therefore, no possible relevancy can be gained from Credix business records.

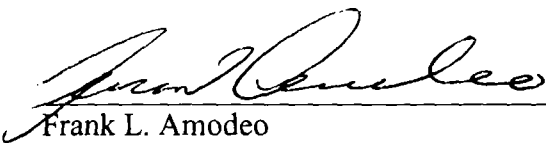
The only contracts between Credix and Signature Graphics, Inc. have already been produced to Merrill; which are:

1. Credix Merger and Acquisition consulting agreement and
2. Conversion of the fees arising from this agreement into common stock of  
Signature Graphics, Inc.

Credix also sent a series of letters to Signature Graphics, Inc. directors suggesting directors formally wind-up Signature Graphics, Inc. affairs. Copies of these were sent contemporaneously to Merrill, bankruptcy Trustee and others.

For emphasis, Credix never received any cash payments or in-kind payments for services or otherwise from Smith International Enterprises, Inc. or Credix, thus Credix matters cannot be relevant to this proceeding.

Respectfully Submitted,

  
Frank L. Amodeo  
2875 S. Orange Ave.  
Ste. 500, PMB 1810  
Orlando, FL 32806

I certify the foregoing notice as been sent by first class mail this 21<sup>st</sup> day of July, 2003 to:

Mr. James Sadrianna  
10025 Chatham Oaks Court  
Orlando, Florida 32836

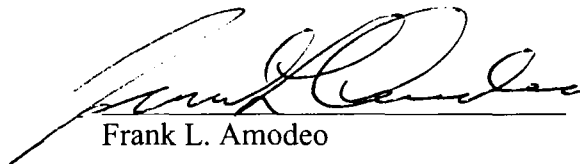
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Counsel for Merrill Lynch



Frank L. Amodeo